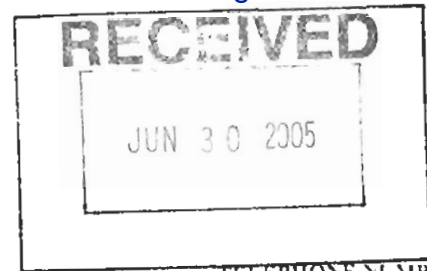


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June 28, 2005

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The Honorable Joseph J. Farnan, Jr.
United States District Court
For the District of Delaware
844 North King Street
Wilmington, Delaware 19801

98-cv-639 (JJF)

Re: Smith vs. Baynard et. al.

Dear Judge Farnan:

I acknowledge receipt of the two Orders entered by Your Honor in the above captioned matter: (1) dated June 8, 2005 permitting me to withdraw as local counsel for the plaintiff and (2) dated June 9, 2005 granting the Defendant's Motion to Strike (D.I. 95) with Plaintiff granted leave to file a Motion for Reconsideration within 30 days from the date of the Order.

As I indicated at the Status Conference, Jeffrey Martin, Esquire, had agreed to take on representation of the plaintiff in this matter, however, since plaintiff resides in Sussex County and operates a boat repair and maintenance business he has not had an opportunity to meet with Mr. Martin, who was unable to meet with Mr. Smith because he was involved in trial of another matter.

In addition, it will be necessary for me to accompany Mr. Smith with the file and it will be difficult to do so and have Mr. Martin file a Motion for Reconsideration within 30 days from the date of the June 9, 2005 Order.

Accordingly, I respectfully request that the Court amend its Order to grant the Plaintiff leave to file a Motion for Reconsideration within 60 days from the date of Your Honor's Order of June 9, 2005.

Respectfully,

A handwritten signature in dark ink, appearing to be "LLW", written over the typed name "Leonard L. Williams".

Leonard L. Williams

LLW/kj

cc: Bruce C. Herron, Esquire